



YourTel America, Inc.  
2800 E 18<sup>th</sup> Street  
Kansas City, MO 64127

October 21, 2008

**Via ECFS**

Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D. C. 20554

**Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92;  
WC 03-109 Petition of TracFone Wireless, Inc. to Establish a Trial Broadband  
Lifeline/Link Up Program; CC 96-45 Federal-State Joint Board for Universal  
Service; WC 05-337 In the Matter of Federal-State Joint Board on Universal Service  
– High Cost Universal Support**

Dear Ms. Dortch,

YourTel America has been providing telephone service and other communications services to low-income consumers in under served markets for over 12 years. Through our efforts many American families have access to affordable phone service.

Over the years changes in regulation have diminished our margins, but our customers cannot afford rate increases. Despite this challenge we have continued to provide service and are continuing to grow and open new markets.

The current proposed changes to intercarrier compensation and the Universal Service Fund again will threaten our ability to maintain rates and grow our business. We respectfully and urgently ask that you to take into consideration our company and already financially burdened low-income consumers in this time of additional economic stress as you finalize your plans. We therefore put forth the following thoughts:

1. **Subscriber Line Charges.** Most of our customers are eligible for Lifeline and as such our SLC is capped at the SLC of the incumbent carrier when seeking reimbursement from the

fund. Our ability under current proposals<sup>1</sup> to recover lost Inter-carrier Compensation revenue is therefore based on the *costs of another company*, not ours. We feel it is only fair that this be uncoupled.

2. Replacement Fund. If the proposed replacement fund<sup>2</sup> does not allow Low-Income CETC's (as opposed to High Cost CETC's) to receive funds please change it accordingly. We have no problem justifying the funds via our costs
3. Broadband Support. We concur with the TracFone program proposal but respectfully ask that our headquartered state of Missouri be added to the list of states in order that we may show the FCC another example of how different companies would utilize the funds. YourTel America currently supports a service level infrastructure in Missouri, including neighborhood retail stores, which is critical in educating consumers.
4. High Cost Cap and Reverse Auctions. As we have previously stated<sup>3</sup> we feel it is imperative that any issues related to caps and reverse auctions not limit the number of Lifeline ETC's nor impede their ability to conduct competitive and affordable business either now or in the future. A little clarity can go along way.

Thank you for your time and consideration,



Dale R. Schmick  
CEO  
YourTel America, Inc.

cc (via email): Chairman Kevin J. Martin  
Hon. Michael Copps  
Hon. Jonathan Adelstein  
Hon. Deborah Taylor Tate  
Hon. Robert McDowell  
Mr. Daniel Gonzalez  
Ms. Amy Bender  
Mr. Scott Deutchman  
Mr. Scott Bergmann  
Mr. Nicholas Alexander  
Mr. Greg Orlando

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<sup>1</sup> Such as the *Petition of AT&T Inc. for Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the "ESP Exemption"*, CC Docket 01-92 regarding *SLC Caps*, pages 8-9.

<sup>2</sup> *Verizon Proposal for Inter-carrier Compensation Reform*, CC Docket 01-92, USF Dial, pages 7-9.

<sup>3</sup> *Comments of YourTel America, Inc.*, WC Docket 05-337, CC Docket 96-45 filed April 17, 2008.